

1 **TIFFANY & BOSCO, P.A.**

2 Krista J. Nielson, Esq.

3 Nevada Bar No. 10698

4 10100 W. Charleston Boulevard, Suite 220

5 Las Vegas, Nevada 89135

6 Telephone: 702 258-8200

7 Fax: 702 258-8787

8 *Attorneys for Defendant National Default Servicing Corporation and Specialized Loan
9 Servicing LLC*

10 TB #22-72748

11 **UNITED STATES DISTRICT COURT**

12 **DISTRICT OF NEVADA**

13 6344 LEGEND FALLS TRUST, a Nevada
14 trust,

15 Plaintiff,

16 vs.

17 NATIONAL DEFAULT SERVICING
18 CORPORATION, an Arizona corporation;
19 SPECIALIZED LOAN SERVICING LLC, a
Delaware limited liability company;
NEVADA LEGAL NEWS, LLC, a Nevada
limited liability company; DOES I through X
and ROE BUSINESS ENTITIES I through X
inclusive,

20 Defendants.

21 Case No.: 2:22-cv-01023-GMN-NJK

22 **ORDER TO EXTEND
23 DISPOSITIVE MOTION DEADLINE
24 (SECOND REQUEST)**

25 Plaintiff, 6344 Legend Falls Trust (hereinafter “Legend” or “Plaintiff”) and Defendants,
26 Specialized Loan Servicing, LLC (“SLS”) and National Default Servicing Corporation
27 (“NDSC”) (collectively “Defendants”), by and through their counsel of record, hereby stipulate
and agree to extend the dispositive motion deadline thirty (30) days, until May 3, 2023. This is
the parties’ second request for an extension of the dispositive motion deadline as the first was
denied without prejudice.

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- 1 1. Plaintiff filed its complaint of April 8, 2022, in Eighth Judicial District Court. (ECF No.
2 1).
- 3 2. The matter was later removed to this Court on June 29, 2022. (ECF No. 1).
- 4 3. Thereafter, Plaintiff filed an Amended Complaint on July 18, 2022. (ECF No. 12).
5 Defendants then filed a Motion to Dismiss Amended Complaint on August 1, 2022.
6 (ECF No. 15). The Motion to Dismiss Amended Complaint was fully briefed as of
7 August 22, 2022. (ECF No. 23).
- 8 4. Plaintiff subsequently filed a Motion to Remand on September 9, 2022. ECF No. 2*).
9 The Motion to Remand is fully briefed as of September 30, 2022. (ECF No. 30).
- 10 5. The Court entered an initial discovery plan and scheduling order on September 6, 2022,
11 setting an April 3, 2023, dispositive motions deadline. (ECF No. 26).
- 12 6. Plaintiff and Defendants are discussing potential settlement regarding this matter. The
13 parties are also working to resolve a discovery dispute regarding deposition topics of
14 NDSC and SLS.
- 15 7. Both the Motion to Remand and Motion to Dismiss Amended Complaint are potentially
16 dispositive motions regarding this matter. *See Sean K. Claggett & Associates, LLC v.*
17 *Keenan*, No. 2:21-cv-02237, 2022 WL 2788441, *2 (D. Nev. Jul.14, 2022 (finding a
18 Motion to Remand potentially dispositive as it concerns jurisdiction)).
- 19 8. As of the date of this filing, the Court has not issued an order on Defendants' Motion to
20 Dismiss Amended Complaint or Plaintiff's Motion to Remand.
- 21 9. It has been more than ninety days since both Motion to Remand and Motion to Dismiss
22 Amended Complaint were fully briefed.
- 23 10. Discovery Completed: Plaintiffs and Defendants have made disclosures of witnesses and
24 documents and Defendants have propounded discovery requests. Defendants noticed the
25 Rule 30(b)(6) deposition of Plaintiff and Plaintiff noticed the Rule 30(b)(6) deposition of
26 NDSC and SLS. As discussed above, the parties are meeting and conferring regarding
27 the deposition topics for SLS and NDSC.

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11. The parties assert good cause exists to extend the dispositive motion deadline as the parties require additional time to complete the depositions of NDSC and SLS and resolve their discovery disputes prior to the filing of dispositive motions.

12. Based on the foregoing, the Parties respectfully stipulate and request that the Court extend the dispositive motion deadline for thirty (30) days until May 3, 2023.

DATED this 21st day of February, 2023

DATED this 21st day of February, 2023

TIFFANY & BOSCO, P.A.

HONG & HONG LAW OFFICE

/s/ Krista J. Nielson, Esq.

/s/ Joseph Y. Hong, Esq.

Krista J. Nielson, Esq.
Nevada State Bar No. 10698
10100 W. Charleston Blvd., Suite 220
Las Vegas, NV 89135
Attorneys for Defendant
National Default Servicing Corporation
Specialized Loan Servicing LLC

Joseph Y. Hong, Esq.
Nevada Bar No: 5995
1980 Festival Plaza Drive, Suite 650
Las Vegas, NV 89135
Attorneys for 6344 Legend Falls Trust

IT IS SO ORDERED.

UNITED STATES MAGISTRATE JUDGE
Case No.: 2:22-cv-01023-GMN-NJK

DATED: February 22, 2023